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December 7, 2006

# By E-Filing

Hon. Gregory M. Sleet United States District Court 844 N. King Street Wilmington, DE 19801

Re: Synopsys, Inc. v. Magma Design Automation, Inc., C.A. 05-701 (GMS)

# Dear Judge Sleet:

In anticipation of the discovery teleconference scheduled for Tuesday, December 12, 2006 at 11:30 a.m. in the above captioned matter, the parties jointly submit the following items to be presented to the Court:

# Plaintiff's Issues:

- 1. Modification of the Scheduling Order (including discovery deadlines and trial date) in light of the below discovery issues.
- 2. Magma's production of source code
- 3. Depositions of Roy Jewell and Rajeev Madhavan
- 4. Magma's contentions regarding its counterclaims
  - a. Antitrust counterclaims
    - i. Amended Response to Interrogatory No. 20
    - ii. Identification of relevant customers
    - iii. New allegations

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- b. Infringement contentions
- 5. The parties' continuing production of responsive documents

# Defendant's Issues:

- 1. Plaintiff's designation of an expert from a firm retained by defendant.
- 2. Production of emails in native file format.

Respectfully,

/s/ Karen Jacobs Louden

Karen Jacobs Louden

cc: Clerk of the Court (by e-filing and hand)
William Marsden, Esq. (by e-filing and hand)
James Elacqua, Esq. (by email)
James Pooley, Esq. (by email)